

VERNER LIPFERT
BERNHARD McPHERSON & HAND
CHARTERED

901 - 15TH STREET, N.W.
WASHINGTON, D.C. 20005-2301
(202) 371-6000
FAX: (202) 371-6279

ERWIN G. KRASNOW
DIRECT: (202) 371-6062

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MAY 12 1997

Federal Communications Commission
Office of Secretary

May 12, 1997

BY HAND DELIVERY

Mr. William F. Caton, Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Re: Lewisville, Gainesville, Robinson,
Corsicana, Jacksboro, and Mineral Wells, Texas
MM Docket No. 97-91
RM-8854

Dear Mr. Caton:

The Certificate of Service of the attached Comments of Graham Newspapers, Inc. which were filed with the Commission on May 6, 1997, is hereby amended to show that on May 12, 1997, a copy of the Comments of Graham Newspapers, Inc. were sent by first-class mail, postage prepaid, to:

Mark Lipp, Esq.,
Ginsburg, Feldman & Bress, Chartered
1250 Connecticut Avenue, N.W.
Washington, DC 20036-2603
Counsel for Hunt Broadcasting, Inc.

and

Jerry Snyder and Associates, Inc.
P.O. Box 638
Mineral Wells, Texas 76067
Licensee of Station KYXS

Respectfully submitted,

GRAHAM NEWSPAPERS, INC.

By E. G. Krasnow
Erwin G. Krasnow
Its Attorney

cc: Robert Hayne, Esq, FCC
Lawrence N. Cohen, Esq.

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Before the
Federal Communications Commission
Washington, D.C. 20554

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In the Matter of)

)
)
Amendment of Section 73.202(b).)
Table of Allotments,)
FM Broadcast Stations.)
(Lewisville, Gainesville, Robinson,)
Corsicana, Jacksboro, and)
Mineral Wells, Texas))

MM Docket No. 97-91
RM-8854

To: Chief, Allocations Branch

RECEIVED

MAY 6 1997

COMMENTS OF GRAHAM NEWSPAPERS, INC.

Graham Newspapers, Inc., licensee of Station KWKQ(FM), Graham, Texas, by its attorneys and pursuant to Section 1.420 of the Commission's rules, hereby submits its Comments in response to the Notice of Proposed Rule Making and Order to Show Cause (DA 97-489) released in the above-captioned rulemaking proceeding on March 14, 1997. In support thereof, the following is shown:

Graham Newspapers, Inc. recently acquired Station KWKQ(FM) and has been exploring possible upgrades to the facility. At present, Station KWKQ operates a Class A facility on Channel 296 (107.1 mhz). The channel is allotted as a Class C3 channel. As shown in the attached Engineering Statement of Sellmeyer Engineering, substitution of Channel 237A at Jacksboro, Texas, would allow Station KWKQ(FM) to upgrade its facilities to Class C2 at a reference point located 16 kilometers north northeast of its present site as illustrated by Exhibit E1-1, a spacing study showing the relevant allotments at a special reference point. Exhibit E1-2 is a section of the NOAA tactical navigation chart TPC G-20-D showing the area in which an FM station operating on Channel 296 may be located if Channel 299 is deleted from Jacksboro.

Graham Newspapers, Inc. is aware that the deadline for the submission of counterproposals in this proceeding was yesterday, and that Section 1.420(d) of the Commission's rules provides that counterproposals will not be considered if they are advanced in reply comments. However, in light of the Commission's mandate under Section 307(b) of the Communications Act to provide a fair, efficient, and equitable distribution of radio service, Graham

Newspapers, Inc. respectfully requests that the Commission substitute Channel 237A at Jacksboro, and on its own motion, amend the Table of Allotments with respect to Graham, Texas, as follows:

PRESENT

296C3

PROPOSED

296C2

As shown in the Engineering Statement, the special reference point for the allotment is:

N.L.: 35° 15' 11"

W.L.: 98° 30' 33"

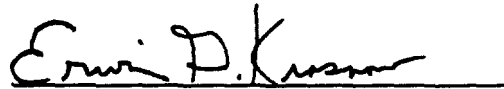
Moreover, there is a wide area in which the proposed Channel 296C2 facility could be located, all of which is on relatively high ground.

WHEREFORE, for the foregoing reasons, Graham Newspapers, Inc. respectfully requests that the Commission substitute Channel 237A for Channel 299A at Jacksboro, Texas, and on its own motion, substitute Channel 296C2 for Channel 296C3 at Graham, Texas.

Respectfully submitted,

GRAHAM NEWSPAPERS, INC.

By:



Erwin G. Krasnow
Verner, Liipfert, Bernhard,
McPherson & Hand, Chartered
901 15th Street, N.W.
Suite 700
Washington, D.C. 20005
Its Attorneys

May 6, 1997

SELLMEYER ENGINEERING
BROADCAST AND COMMUNICATIONS CONSULTING ENGINEERS
P.O. Box 355 McKinney, Texas 75070
MEMBER APCOE
(972) 642-2066

**ENGINEERING STATEMENT IN SUPPORT OF COMMENTS
OF GRAHAM NEWSPAPERS, INC.
MM DOCKET 97-91
RM-8854
MAY, 1997**

This Firm has been retained by Graham Newspapers, Inc., licensee of Radio Station KWKQ, Graham, Texas to prepare this Engineering Statement in support of its comments in the matter of Mass Media Docket 97-91. Docket 97-91 proposes to amend the FM Table of Allotments in Section 73.202(b) of the Rules with respect to assignments at the communities of Lewisville, Gainesville, Robinson, Corsicana, Jacksboro and Mineral Wells, Texas.

Graham Newspapers, Inc. supports the request of Heftel Broadcasting Corporation in the proposed changes to the Table of Allotments. Graham Newspapers, Inc.'s Station KWKQ would be directly affected by this proposal through the proposed deletion of Channel 299A and substitution of Channel 237A at Jacksboro, Texas.

Graham Newspapers, Inc. recently acquired Radio Station KWKQ and has been exploring possible upgrades to the facility. At present Station KWKQ operates a Class A facility on Channel 296 (107.1). The channel is allotted as a Class C3 channel. Substitution of Channel 237A at Jacksboro would allow Station KWKQ to upgrade its facilities to Class C2 at a reference point located 16 kilometers north northeast of its present site as illustrated by Exhibit E1-1, a spacing study showing the relevant allotments at a Special Reference Point. Exhibit E1-2 is a section of the NOAA tactical navigation chart TPC G-20-D showing the area in which an FM station operating on Channel 296 may be located if Channel 299 is deleted from Jacksboro.

Graham Newspapers, Inc. respectfully requests that the Commission, on its own motion, add the community of Graham, Texas to the pending MM Docket 97-91 and that the Table of Allotments be amended with respect to Graham, Texas as follows:

<u>PRESENT</u>	<u>PROPOSED</u>
296C3	296C2

The Special Reference Point for the allotment is:

N.L.: 35° 15' 11"
W.L.: 98° 30' 33"

There is a wide area in which the proposed Channel 296C2 facility could be located, all of which is on relative high ground.

SELLMEYER ENGINEERING
BROADCAST AND COMMUNICATIONS CONSULTING ENGINEERS
 P.O. Box 856 McKinney, Texas 75070
 MEMBER AFCCE
 (972) 642-3068

EXHIBIT E1-1
FM SPACING STUDY FOR CLASS C-2 OPERATION
SPECIAL REFERENCE POINT
GRAHAM NEWSPAPERS, INC.
RADIO STATION KWKQ
GRAHAM, TEXAS
MAY, 1997

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FM Study for: KWKQ /SPEC REF PT   FCC Database Date: 4/97   33-15-11
Location: GRAHAM, TX               Channel Class: C2       98-30-33
Call City, State                   Chan Class Freq km Latitude Dist. Required
Status Proponent                   File Number HAAT Longitude Azm. Clear (km)
-----
>>>>>>> Study For Channel 296 107.1 MHz <<<<<<<
-----
ALLOC GRAHAM, TX                   296 C3 107.1       33-07-37 16.0 177
VAC                                Docket-89-280      0 98-35-35 209.2 -161.0 SHORT
                                Use of 73.215 for short spacing requires: 166 -150.0 SHORT

KWKQ GRAHAM, TX                   296 A 107.1 3.00 33-07-37 16.0 166
LIC KSWA, INC.                   BLH-6776           30 98-35-35 209.2 -150.0 SHORT
                                Use of 73.215 for short spacing requires: 143 -127.0 SHORT

ALLOC JACKSBORO, TX               299 A 107.7       33-14-14 32.4 55
DEL HEFTEL BROADCASTING C Docket-97-91 0 98-09-43 93.0 -22.6 SHORT
                                Use of 73.215 for short spacing requires: 53 -20.6 SHORT

ALLOC JACKSBORO, TX               299 A 107.7       33-14-14 32.4 55
VAC                                Docket-96-10       0 98-09-43 93.0 -22.6 SHORT
                                Use of 73.215 for short spacing requires: 53 -20.6 SHORT

ALLOC COLEMAN, TX                 296 C3 107.1       31-51-16 177.42 177
USE                                -                  0 99-25-36 209.3 +0.42 CLOSE

KSTAFM COLEMAN, TX                 296 C3 107.1 25. 31-51-16 177.42 177
CP COLEMAN COUNTY BROADCAST      BPH-9604161D 65 99-25-36 209.3 +0.42 CLOSE

KSTAFM COLEMAN, TX                 296 A 107.1 3.00 31-51-16 177.4 166
LIC COLEMAN COUNTY BROADCAST      BLH-6495         55 99-25-36 209.3 +11.4 CLOSE

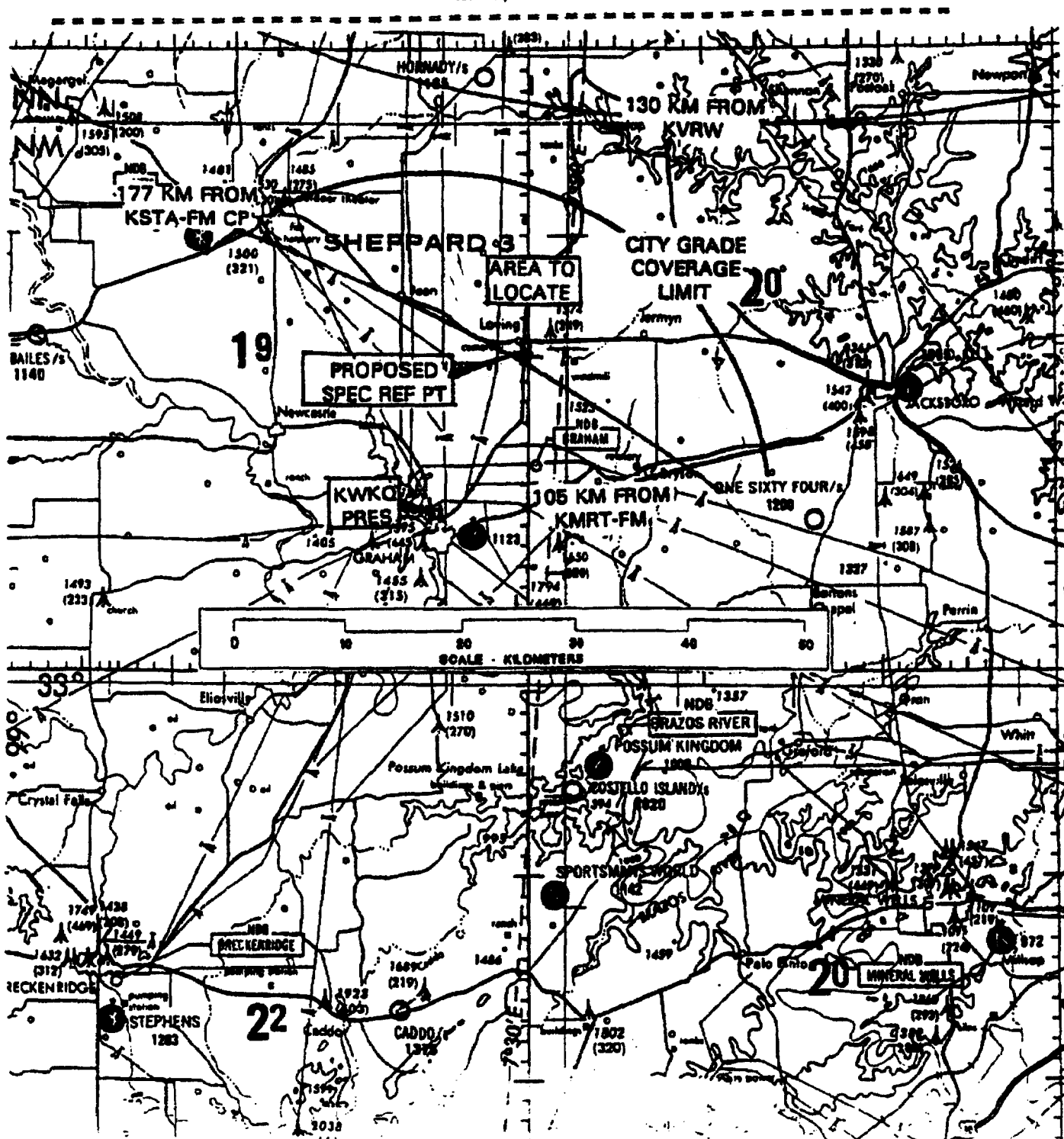
KNRTFM GRANBURY, TX               294 C 106.7 100. 32-15-07 119.2 105
LIC KCYT-FM LICENSE CORPO        BLH-900125KC 302 98-02-48 158.5 +14.2 CLOSE

ALLOC GRANBURY, TX                 294 C 106.7       32-14-35 121.2 105
USE                                Docket-79-178      0 98-00-55 157.4 +16.2 CLEAR

KVRW LANTON, OK                   297 C2 107.3 50. 34-36-27 151.8 130
LIC ARTHUR PATRICK               BLH-920313KC 150 98-16-26 8.2 +21.8 CLEAR
  
```

SELLMEYER ENGINEERING
 BROADCAST AND COMMUNICATIONS CONSULTING ENGINEERS
 P.O. Box 356 McKinney, Texas 75070
 MEMBER APCCE
 (972) 542-2056

EXHIBIT E1-2
MAP SHOWING AREA TO LOCATE
CHANNEL 296C-2
GRAHAM, TEXAS
MAY, 1997



SELLMEYER ENGINEERING
BROADCAST AND COMMUNICATIONS CONSULTING ENGINEERS
P.O. Box 356 McKinney, Texas 75070
MEMBER APCCE
(972) 542-2056

CERTIFICATION OF ENGINEER

I hereby state that:

I am President of Sellmeyer Engineering

The Firm of Sellmeyer Engineering has been retained by Graham Newspapers, Inc. to prepare this Engineering Exhibit

I am a graduate of Arizona State University with the degree of Bachelor of Science in Engineering

I am a Registered Professional Engineer in the States of Ohio and Texas

My qualifications as an Engineer are a matter of record with the Federal Communications Commission, having been previously accepted in applications of this type

This Engineering Exhibit was prepared by me personally or under my direct supervision, and

All facts stated herein are true and correct to the best of my knowledge and belief.



J. S. Sellmeyer, P. E.

May 5, 1997

P. O. Box 356
McKinney, Texas 75070
972-542-2056



CERTIFICATE OF SERVICE

I, Laurel M. Akhund, hereby certify that I have, on this 6th day of May, 1997, send by first-class mail, postage prepared, copies of the foregoing "Comments of Graham Newspapers, Inc." to the following:

* Robert Hayne, Esq.
Mass Media Bureau, Room 8337
Federal Communications Commission
2025 M Street, N.W.
Washington, D.C. 20554

Lawrence N. Cohn, Esq.
Cohn & Marks
1333 New Hampshire Avenue, N.W.
Suite 600
Washington, D.C. 20036-1573

Counsel for Heftel Broadcasting Corporation


Laurel M. Akhund

* By Hand